

**TROUTMAN SANDERS LLP**  
Christina H. Bost Seaton (CB-7667)  
The Chrysler Building  
405 Lexington Avenue  
New York, New York 10174  
(212) 704-6000  
*Attorneys for Defendant*  
*Hartford Life and Accident Insurance Company*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**JULIE JACOBY,**

Plaintiff,

**-against-**

HARTFORD LIFE AND ACCIDENT INSURANCE  
COMPANY,

Defendant.

**No.: 07 Civ. 4627 (LAK) (RLE)**

## **UNOPPOSED MOTION TO SEAL ADMINISTRATIVE RECORD**

Defendant Hartford Life and Accident Insurance Company (“Hartford”), by counsel, hereby moves this Court to seal the administrative record to be filed on March 10, 2008, in order to prevent public disclosure of personal data identifiers and other confidential information contained in the administrative record. Counsel for Plaintiff has stated that he does not oppose this Motion. The reasons for Hartford’s motion are more fully explained in the accompanying non-confidential memorandum.

WHEREFORE, Hartford Life and Accident Insurance Company requests that the Court enter an order allowing the administrative record to be filed under seal.

Dated: New York, New York  
February 18, 2008

HARTFORD LIFE AND ACCIDENT  
INSURANCE COMPANY

By: 

Christina H. Bost Seaton (CB-7667)

TROUTMAN SANDERS LLP

The Chrysler Building

405 Lexington Avenue

New York, New York 10174

(212) 704-6000

David E. Constine, III (VSB No. 23223)

Admitted *pro hac vice*

Troutman Sanders LLP

P. O. Box 1122

Richmond, Virginia 23218-1122

(804) 697-1200

FAX (804) 697-1339

Attorneys for Defendant

Hartford Life and Accident Insurance Company

## PROPOSED ORDER

**TROUTMAN SANDERS LLP**  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**JULIE JACOBY,**

Plaintiff,

**-against-**

HARTFORD LIFE AND ACCIDENT INSURANCE  
COMPANY,

**Defendant.**

**No.: 07 Civ. 4627 (LAK) (RLE)**

## ORDER

CAME THIS DAY, Hartford Life and Accident Insurance Company (“Hartford”), by counsel, upon its Motion to Seal the Administrative Record.

WHEREAS, the policy of the Judicial Conference of the United States and the E-Government Act of 2002, Pub. L. No. 107-347, requires filing parties to omit or, where inclusion is necessary, partially redact from all pleadings, documents, and exhibits filed with the Court, whether electronically or on paper, certain personal identifiers, including: (1) minors' names, (2) financial account numbers, (3) Social Security numbers, and (4) dates of birth;

WHEREAS, the filing party should omit, or where inclusion is necessary, partially redact the following confidential information from all pleadings, documents, and exhibits, whether filed electronically or on paper, unless the Court orders otherwise: (1) personal identifying numbers,

such as a driver's license number, (2) medical records, including documents pertaining to treatment and diagnosis, (3) employment history information, (4) individual financial information, and (5) proprietary or trade secret information;

WHEREAS, this Court's "Notice Regarding Privacy and Public Access to Electronic Civil and Criminal Case Files," issued pursuant to the E-Government Act of 2002, states that a party may file under seal an unredacted document containing the personal identifiers described above;

WHEREAS, Hartford intends to file the administrative record in this case with the Court;

WHEREAS, the administrative record contains personal data identifiers and other confidential information, including medical records and employment information;

WHEREAS, the personal data identifiers and other confidential information contained in the administrative record, particularly the medical records and employment information, are essential to the Court's review of this case involving plaintiff's claim for long term disability benefits under ERISA and cannot be feasibly redacted from the record;

WHEREAS, good cause has been shown to allow the administrative record to be filed under seal;

It is hereby ORDERED that the administrative record shall be filed UNDER SEAL.

The Clerk of the Court is hereby directed to send a copy of this Order to all counsel of record.

ENTERED:

\_\_\_\_\_  
U.S. District Judge

I ask for this:

HARTFORD LIFE AND ACCIDENT  
INSURANCE COMPANY

By: 

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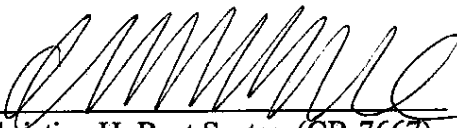
CERTIFICATE OF SERVICE

I hereby certify that I am attorney for Defendant and that on February 27, 2008, I electronically filed a copy of the foregoing with the Clerk of the Court and served a copy of the same by first class mail to the following:

TO:

Scott M. Riemer  
60 East 42nd Street  
Suite 2430  
New York, NY 10165

Dated: New York, New York  
February 22, 2008

  
\_\_\_\_\_  
Christina H. Bost Seaton (CB-7667)  
TROUTMAN SANDERS LLP  
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(212) 704-6000